

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY, LLC, <i>et al.</i>,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>

**NOTICE OF WITHDRAWAL OF EMERGENCY MOTION OF BP  
EXPLORATION & PRODUCTION INC.  
TO FILE CONFIDENTIAL EXHIBITS UNDER SEAL**

PLEASE TAKE NOTICE that BP Exploration & Production Inc. (“BP”) hereby withdraws the *Emergency Motion of BP Exploration & Production Inc. to File Confidential Exhibits Under Seal* (the “Emergency Motion”), filed on February 2, 2021 at Docket No. 836, and will file replacement exhibits with respect to the documents initially sought by BP to be sealed in connection with the Emergency Motion.

PLEASE TAKE FURTHER NOTICE that BP has consulted with the Office of the United States Trustee (“U.S. Trustee”) and Debtors’ counsel and, consistent with those discussions, BP will be filing a separate motion for an order authorizing BP to file, with redactions, a confidential exhibit introduced at trial under seal on February 2, 2021. This exhibit is the same confidential document, containing the same redactions, that the Debtors filed with the Court on February 11, 2021 at Docket No. 872 as part of their replacement exhibits.<sup>2</sup>

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

<sup>2</sup> In addition to the exhibits BP sought approval to file under seal in connection with the Emergency Motion, BP also initially deemed confidential certain exhibits introduced at the hearing before this Court on February 2, 2021. For the avoidance of doubt, with the consent of the Debtors and the U.S. Trustee, the only remaining confidential exhibit for

Date: February 23, 2021

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

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***Counsel for BP Exploration & Production Inc.***

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which BP will seek approval to file in redacted form is the exhibit referenced herein. BP will otherwise publicly file replacement exhibits in respect of all other exhibits introduced by BP at the February 2, 2021 trial.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 23, 2021, I caused a copy of the foregoing to be served on all parties eligible to receive service through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas by electronic mail.

By: /s/ Karl D. Burrer

Karl D. Burrer